

Howie C. Morales Lt. Governor

## NEW MEXICO ENVIRONMENT DEPARTMENT

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James C. Kenney
Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

#### **Certified Mail - Return Receipt Requested**

August 5, 2019

Mr. Mitch Knapton, General Manager/Chief Engineer Peabody Natural Resources Company El Segundo Mine P.O. Box 757 Grants, New Mexico 87020

RE: Peabody Natural Resources Company, El Segundo Mine, Minor Non-Municipal Individual Permit; SIC 1221; NPDES Compliance Evaluation Inspection; NPDES NM0030996; July 16, 2019

Dear Mr. Knapton:

Enclosed please find a copy of the report and check list for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the Federal Clean Water Act.

Introduction, treatment scheme, and problems noted during this inspection are discussed in the Further Explanations section of the inspection report.

You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and to modify your operational and/or administrative procedures, as appropriate. Further, you are encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

David Long
US Environmental Protection Agency, Suite 1200
Enforcement Branch (6EN-WS)
1445 Ross Avenue
Dallas, Texas 75202-2733

Sarah Holcomb, Program Manager New Mexico Environment Department Surface Water Quality Bureau Source Regulation Section P.O. Box 5469 Santa Fe, New Mexico 87502 Peabody Natural Resources Company, El Segundo Mine August 5, 2019

If you have any questions about this inspection report, please contact Daniel Valenta at (505) 827- 2575 or at <a href="mailto:Daniel.Valenta@state.nm.us.">Daniel.Valenta@state.nm.us.</a>

Sincerely,

/s/Sarah Holcomb

Sarah Holcomb Surface Water Quality Bureau

Cc. Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail David Long, USEPA (6EN-WM) by e-mail Amy Andrews, USEPA (6EN-WM) by e-mail David Esparza, USEPA (6EN-WM) by e-mail Darlene Whitten-Hill, USEPA (6EN-WC) by e-mail John Rhoderick, NMED District I by e-mail Nancy Williams, USEPA (6EN-WC) by e-mail Chad Gaines, Peabody Natural Resources by e-mail

Form Approved OMB No. 2040-0003 Approval Expires 7-31-85



#### **NPDES Compliance Inspection Report**

	Section A: National Data System Coding						
1	Transaction Code						
	S U R F A C	Е	C O A	L M	Remar I	rks N E	
	Inspection Work Days 67 69		Facility Evaluation Ra	ating 71	BI <b>N</b>	QA	Reserved
				Section 1	B: Fac	cility Data	
POT	ne and Location of Facility Inspected ( TW name and NPDES permit number)			-		Entry Time /Date 1145 hours / July 16, 2019	Permit Effective Date January 18, 2016
	Segundo Mine, Peabody Natural xico. From I-40, take Exit 79 in					O Exit Time/Date	Permit Expiration Date
Old	Hwy 66, turn right onto NM 60	5, cro	ss railroad tracks,	travel 14 miles,	at N	IM	October 31, 2019
Cou	travel north to mile maker 22, Earty				ney	1340 hours / July 16, 2019	
Nan	ne(s) of On-Site Representative(s)/Title	(s)/Ph	one and Fax Number(s	s)			Other Facility Data
-M	nad Gains, Environmental Specia yron Newman, Technician II/505 th Pulse, Engineering Manager,	5-285	-3062	esources Compa	any /	505-285-2076	Latitude 35.639193°, Longitude -107.838095°
No	ne, Address of Responsible Official/Ti	tla/Dh	one and Eav Number				SIC 1221 (Sub-Bituminous Coal
	· ·			N . 1D		Contacted	Mine)
	ch Knapton, General Manager/C mpany, P.O. Box 757, Grants, N 11					5- Yes No *	
Section C: Areas Evaluated During Inspection (S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)							
S	Permit	N	Flow Measurement	t	S	Operations & Maintenance	N CSO/SSO
S	Records/Reports	N	Self-Monitoring Pr	ogram	N	Strange Hamaning 2 is posai	N Pollution Prevention
S	Facility Site Review	N	Compliance Schedu	ules	N	-	Multimedia
N	N Effluent/Receiving Waters N Laboratory N Storm Water			Storm (Vater	N Other:		
			Section D: Summary	of Findings/Com	ment	is (Attach additional sheets if necessary)	
1. See attached report and further explanations.							
Name(s) and Signature(s) of Inspector(s)  Agency/Office/Telephone/Fax  Date						Date	
Daniel Valenta /s/Daniel Valenta NMED/SW			NMED/SWQ1	B/505	8/2/2019 505-827-2575		
Signature of Management QA Reviewer Jennifer Foote  Agency/Office/Phone and Fax Numbers NMED/SWQB/505-827-0596  Date					<b>Date</b> 8/2/2019		

NPDES CEI – El Segundo Mine – July 16, 2019	PERMIT NO. <b>NM0030996</b>	
SECTION A - PERMIT VERIFICATION		
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS.    S  M  U  NA (FURTHER IDETAILS:	EXPLANATION ATTACHED <u>No</u> )	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE.	⊠ y □ n □ na	
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES. No reported discharge	. □Y□N⊠NA	
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT.	⊠ y □ n □ na	
4. ALL DISCHARGES ARE PERMITTED.	⊠y □n □na	
SECTION B - RECORDKEEPING AND REPORTING EVALUATION		
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT. $\boxtimes$ S $\square$ M $\square$ U $\square$ NA (Further Details:	ER EXPLANATION ATTACHED <u><b>No</b></u> )	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs. No reported discharges /no analyti	cal results □ Y □ N ⊠ NA	
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE. <b>No sampling and analysis data</b>	□s□m□u ⊠ NA	
a) DATES, TIME(S) AND LOCATION(S) OF SAMPLING.	□ y □ n ⊠ na	
b) NAME OF INDIVIDUAL PERFORMING SAMPLING	□ y □ n ⊠ na	
c) ANALYTICAL METHODS AND TECHNIQUES.	□ y □ n ⊠ na	
d) RESULTS OF ANALYSES AND CALIBRATIONS.	□ y □ n ⊠ na	
e) DATES AND TIMES OF ANALYSES.	□ y □ n ⊠ na	
f) NAME OF PERSON(S) PERFORMING ANALYSES.	□ y □ n ⊠ na	
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE.	□ S □ M □ U ⊠ NA	
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR.	□s □m □u ⊠ NA	
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA.	□ y □ n ⊠ nA	
SECTION C - OPERATIONS AND MAINTENANCE		
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED.    S  M  U  NA (FURTHER E DETAILS: At the facility is a domestic wastewater mechanical plant w/aeration and chlorination		
1. TREATMENT UNITS PROPERLY OPERATED.	$\boxtimes$ S $\square$ M $\square$ U $\square$ NA	
2. TREATMENT UNITS PROPERLY MAINTAINED.	⊠s □ m □ u □ NA	
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED. Gravity flow through the plant.	⊠s □m □u □na	
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE. Red light comes on if power	failure.⊠S□M□U□NA	
5. ALL NEEDED TREATMENT UNITS IN SERVICE.	⊠ S □ M □ U □ NA	
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED.	⊠s □ m □ u □ NA	
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED.	⊠s □ m □ u □ NA	
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE.	⊠ y □ n □ na	
STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED.	⊠y□n □na ⊠y□n □na	

NPDES CEI – El Segundo Mine – July 16, 2019	PERMIT NO. <b>NM0030996</b>
SECTION C - OPERATIONS AND MAINTENANCE (CONT'D)	
9. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR? IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED? HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS?	□ y ⊠ n □ na □ y □ n ⊠ na □ y □ n ⊠ na
10.HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT? IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT?	□ y ⊠ n □ na □ y □ n ⊠ na
SECTION D - SELF-MONITORING	
PERMITTEE SELF-MONITORING MEETS PERMIT REQUIREMENTS. $\square$ S $\square$ M $\square$ U $\boxtimes$ NA (FURTHE DETAILS: No reported discharge since 2009.	ER EXPLANATION ATTACHED <u>No</u> ).
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT.	□ y □ n ☒ NA
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES.	□ y □ n ☒ na
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT.	□ y □ n ⊠ na
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT.	□ y □ n ⊠ na
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT.	□ y □ n ⊠ na
6. SAMPLE COLLECTION PROCEDURES ADEQUATE.	□ y □ n ⊠ na
a) SAMPLES REFRIGERATED DURING COMPOSITING.	□ y □ n ☒ na
b) PROPER PRESERVATION TECHNIQUES USED.	□ y □ n ☒ na
c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136.3.	□ y □ n ⊠ na
7. IF MONITORING AND ANALYSES ARE PERFORMED MORE OFTEN THAN REQUIRED BY PERMIT, ARE THE RESULTS REPORTED IN PERMITTEE'S SELF-MONITORING REPORT?	□y□n⊠na
SECTION E - FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS.    S M U NA (FURTHER EX DETAILS:  Part I.A of the permit requires estimate only.	XPLANATION ATTACHED <u><b>No</b></u> )
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED. TYPE OF DEVICE	□y□n⊠na
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED.	⊠ y □ n □ na
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED.	□ y □ n ☒ na
4. CALIBRATION FREQUENCY ADEQUATE.  RECORDS MAINTAINED OF CALIBRATION PROCEDURES.  CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE.	□ y □ n 図 na □ y □ n 図 na □ y □ n 図 na
5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE.	□ y □ n ⊠ nA
6. HEAD MEASURED AT PROPER LOCATION.	□ y □ n ⊠ na
7. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES.	⊠ y □ n □ na
SECTION F – LABORATORY	
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS.	R EXPLANATION ATTACHED <u>No</u> )
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES).	□ y □ n ⊠ na

	NPDES CEI – El Segundo Mine – July 16, 2019 PERMIT NO. NM0030996					O. <b>NM0030996</b>	
SECTION F - LABORATORY (CONT'D)							
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED.							
3. SATISFACTORY	3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT.						
4. QUALITY CON	TROL PROCEDURES	S ADEQUATE.					⊠ y □ n □ na
5. DUPLICATE SA	MPLES ARE ANALY	YZED % OF THE T	ГІМЕ.				□ y □ n ⊠ nA
6. SPIKED SAMPL	ES ARE ANALYZEI	D % OF THE TIME					□ y □ N ☒ NA
7. COMMERCIAL	LABORATORY USE	ED.					⊠ y □ n □ na
LAB NAME LAB ADDRESS PARAMETERS F	PERFORMED						
SECTION G - E	FFLUENT/RECE	IVING WATERS (	DBSERVATIONS.	□ѕ□м□	U 🗵 NA (FURTE	IER EXPLANATION ATTA	СНЕD <u><b>No</b></u> ).
OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
Various	No Discharge	No Discharge	No Discharge	No Discharge	No Discharge	No Discharge	No Discharge
RECEIVING WAT	ER OBSERVATIONS	No flow / No	discharge obser	ved			
SECTION H - SLUDGE DISPOSAL							
SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS.							
1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY. <b>No discharge/no effluent reported</b>							
2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503. □ S □ M □ U ☒ NA							
3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO:(e.g., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE)							
SECTION I - SAMPLING INSPECTION PROCEDURES (FURTHER EXPLANATION ATTACHED <u>No</u> ).							
1. SAMPLES OBTAINED THIS INSPECTION. □ Y □ N ☒ NA							
2. TYPE OF SAMPLE OBTAINED							
GRAB COMPOSITE SAMPLE METHOD FREQUENCY							
3. SAMPLES PRESERVED. □ Y □ N ☒ NA							
4. FLOW PROPORTIONED SAMPLES OBTAINED.							
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE.							
6. SAMPLE REPRESENTATIVE OF VOLUME AND MATURE OF DISCHARGE.							
7. SAMPLE SPLIT WITH PERMITTEE. □ Y □ N ☒ NA							
8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED. □ Y □ N ☒ NA							
9. SAMPLES COL	9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT.						

# EL Segundo Mine Peabody Natural Resources Company Compliance Evaluation Inspection NPDES Permit No. NM0030996 July 16, 2019

#### **Further Explanations**

#### Introduction

On July 16, 2019, a Compliance Evaluation Inspection (CEI) was conducted by Daniel Valenta accompanied by Sandra Gabaldon, both of the State of New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB) of the Peabody Natural Resources Company, El Segundo Mine, operated by Peabody Energy Western Coal Company, located north of Milan, New Mexico in McKinley County.

The facility is classified as a minor industrial discharger under the federal Clean Water Act, Section 402, of the National Pollutant Discharge Elimination System (NPDES) permit program. It is assigned NPDES permit number NM0030996 which regulates discharge from several outfalls to unclassified Kim-me-ni-oli Valley Tributary in Segment No. 20.6.4.97 State of New Mexico Standards for Interstate and Intrastate Surface Waters, 20.6.4 New Mexico Administrative Code (NMAC), thence to Chaco River, a tributary of San Juan River of the San Juan River Basin. East of NM 502 and the Continental Divide, discharges are to unclassified Inditos Draw in Segment 20.6.4.97 NMAC, thence to Voght Draw, thence to Arroyo Chico, thence to Rio Puerco (East), thence to the Rio Grande.

The NMED performs a certain number of CEIs each year for the U.S. Environmental Protection Agency (USEPA), Region VI. The purpose of this inspection is to provide the USEPA with information to evaluate the Permittee's compliance with the NPDES permit. This inspection report is based on information provided by the Permittee's representatives, observations made by the NMED inspectors, and records and reports kept by the Permittee and/or NMED. Additional information was obtained from http://www.peabodyenergy.com.

Upon arrival at the Lee Ranch Mine at approximately 1145 hours on the day of this inspection, the inspector made introductions, presented credentials and explained the purpose of the inspection to Mr. Chad Gaines, Engineering Specialist. The inspectors toured portions of the facility with Mr. Myron Newman and Mr. Seth Pulse. The inspectors left the El Segundo mine at approximately 1340 hours.

The NMED performs a certain number of CEIs each year for the U.S. Environmental Protection Agency (USEPA), Region VI. The purpose of this inspection is to provide the USEPA with information to evaluate the Permittee's compliance with the NPDES permit. This inspection report is based on information provided by the Permittee's representatives, observations made by the NMED inspectors, and records and reports kept by the Permittee and/or NMED.

#### **Facility Description/Treatment Scheme**

El Segundo Mine, located in Northwest New Mexico adjacent to Lee Ranch Mine, opened in 2008. El Segundo is one of the most productive mines in the Southwest because of its low overburden ratio.

# EL Segundo Mine Peabody Natural Resources Company Compliance Evaluation Inspection NPDES Permit No. NM0030996 July 16, 2019

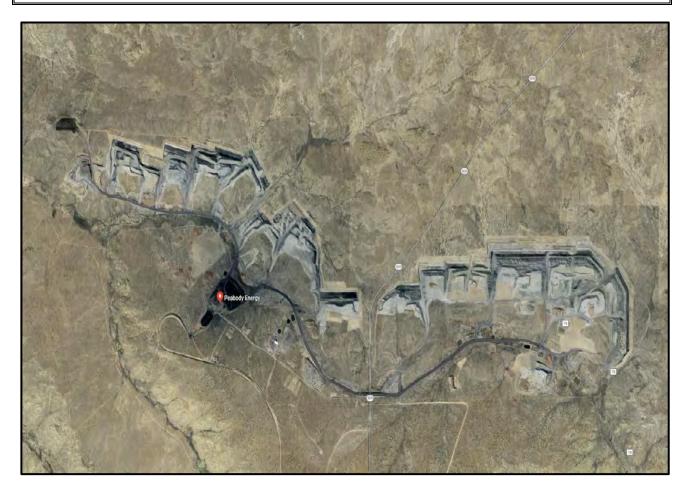
El Segundo shipped 8.1 million tons of coal in 2015, employing about 320 people, as reported in the Albuquerque Journal. El Segundo is a surface mine which uses dozers, shovels, and trucks to uncover between two and five coal seams ranging from 1.5- to 16-feet thick. The mined coal is trucked to an onsite loading facility and transported to customers via the Burlington Northern Santa Fe Railway.

#### Finding:

Per Permittee on-site representative there have been no discharges from the site or from impoundments. Site Inspection found no indications discharges have occurred. All required Discharge Monitoring Reports have been submitted via the Net DMR system. The current permit expires October 31, 2019. A new permit application was submitted on July 23. 2019.

## NMED/SWQB Google Earth Overview

	Date: 7/16/2019			
City/County: 35 miles north of Milan, in Grants, McKinley County				
Location: Peabody Natural Resources Company, El Segundo Mine				



Photographer: Daniel Valenta	Date: 7/16/2019	Time: 1306			
City/County: 35 miles north of Milan, in Grants, McKinley County					
Location: Peabody Natural Resources Company, El Segundo Mine					
Subject: Shovel removes overburden from coal seam.					



Photographer: Daniel Valenta	Date: 7/16/2019	Time: 1246			
City/County: 35 miles north of Milan, in Grants, McKinley County					
Location: Peabody Natural Resources Company, El Segundo Mine					
Subject: Internal containment pond to capture rain events. Coal loading area in background.					



Photographer: Daniel Valenta	Date: 7/16/2019	Time: 1259			
City/County: 35 miles north of Milan, in Grants, McKinley County					
Location: Peabody Natural Resources Company, El Segundo Mine					
Subject: Internal containment pond to capture rain events.					



Photographer: Daniel Valenta	Date: 7/16/2019	Time: 1306			
City/County: 35 miles north of Milan, in Grants, McKinley County					
Location: Peabody Natural Resources Company, El Segundo Mine					
Subject: Front edge of mining activity. Overburden is being removed and coal seam mined with removed material then returned.					



Photographer: Daniel Valenta	Date: 7/16/2019	Time: 1329				
City/County: 35 miles north of Milan, in Grants, McKinley County						
Location: Peabody Natural Resources Company, El Segundo Mine						
Subject: Sewage lagoon outfall 18. Lined lagoon captures treated wastewater discharge from facility.						

